

### REMARKS

Claims 1, 3 to 14, 16, and 18 to 34 were pending in the above-identified application when last examined. Applicant has amended 1, 9, and 18, and canceled claim 20.

#### § 102 Rejections

The Examiner rejected claims 1, 3 to 14, 16, 18 to 22, and 24 to 34 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,173,374 ("Heil et al.").

#### Claim 1 and its dependent claims

Regarding claim 1, the Examiner stated:

Heil discloses a node controller (Figure 1, 117) for a node in a data storage system having at least two nodes, each node comprising one computer-memory complex (Figure 1, 100, 105) and one node controller distinct from said one computer-memory complex, the node controller being operable to transfer data between the two nodes as instructed by a computer-memory complex of the node but without any further intervention by the computer-memory complex, the node controller comprising a cluster memory for storing data being transferred between the two nodes (Figure 1).

June 3, 2005 Office Action, p. 2, paragraph 3. Applicant has amended claim 1 to distinguish from Heil et al. Claim 1 now recites:

1. A node controller for a node in a data storage system, the node being linked to another node and the nodes being locally coupled to a same host device and a same storage device, each node comprising one computer-memory complex and one node controller distinct from said one computer-memory complex, the node controller being operable to transfer data between the two nodes as instructed by a computer-memory complex of the node but without any further intervention by the computer-memory complex, the node controller comprising a cluster memory for storing data being transferred through the node.

Amended claim 1 (emphasis added). As can be seen, amended claim 1 recites a node having a computer-memory complex and a node controller distinct from the computer-memory complex. Furthermore, claim 1 recites that the node is linked to another node and both nodes are locally coupled to the same host device and the same storage device.

The Examiner cites CPUs 100 and caches 105 of Heil et al. as the "computer-memory complex" recited in claim 1, and a host bus adapter (HBA) 117 of Heil et al. as the "the node controller" recited in amended claim 1. As interpreted by the Examiner, Heil et al. does not disclose

a host device coupled to the node. This is because CPUs 100 and caches 105 has been cited as the "computer-memory complex" and instead of the "host device" recited in amended claim 1.

Furthermore, Heil et al. does not disclose two nodes locally coupled to the same host device and the same storage device as recited in amended claim 1. Accordingly, amended claim 1 is patentable over Heil et al.

Claims 3 to 8, 28, and 34 depend from amended claim 1 and are patentable over Heil et al. for at least the same reasons as amended claim 1.

Claim 9 and its dependent claims

Applicant has amended claim 9 with limitations similar to amended claim 1. Amended claim 9 is therefore patentable over Heil et al. for at least the same reasons as amended claim 1.

Claims 10 to 14, 16, and 33 depend from amended claim 9 and are patentable over Heil et al. for at least the same reasons as amended claim 9.

Claim 18 and its dependent claims

Applicant has amended claim 18, which now recites "a plurality of input/output interfaces for coupling to a computer-memory complex of the node, a host device, and a storage device ...." Amended claim 18. As discussed above with claim 1, Heil et al. does not disclose both the recited "computer-memory complex" of the node and the recited "host device" coupled to the node. Accordingly, claim 18 is patentable over Heil et al.

Claims 19 to 22 and 24 to 27 depend from amended claim 18 and are patentable over Heil et al. for at least the same reasons as amended claim 18.

Claim 29 and its dependent claims

Claim 29 recites "one or more bus interfaces for communicating with a host device, a data storage device, and a computer-memory complex of the node ...." Claim 29. As discussed above with claim 1, Heil et al. does not disclose both the recited "computer-memory complex" of the node and the recited "host device" coupled to the node. Accordingly, claim 29 is patentable over Heil et al.


Claims 30 to 32 depend from claim 29 and are patentable over Heil et al. for at least the same reasons as amended claim 29.

§ 103 Rejections

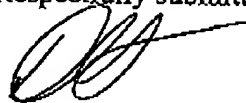
The Examiner rejected claim 23 under 35 U.S.C. § 103(a) as being obvious in view of Heil et al. and what is well known in the art. Claim 23 depend from amended claim 18 and is patentable for at least the same reasons as amended claim 18.

Summary

In summary, claims 1, 3 to 14, 16, 18 to 34 were pending in the above-identified application when last examined. This Amendment amends claims 1, 9, and 18, and cancels claim 20. For the above reasons, Applicant respectfully requests the Examiner with withdraw the claim rejections and allow claims 1, 3 to 14, 16, 18, 19, and 21 to 34. Should the Examiner have any questions, please call the undersigned at (408) 382-0480x206.

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Respectfully submitted,



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